

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 CHRIS KALTSAS (NYBN 5460902)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7200
8 Facsimile: (415) 436-7234
Email: chris.kaltsas2@usdoj.gov

Attorneys for United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,)
14 Plaintiff,)
15 v.)
16 ONE PARCEL OF REAL PROPERTY)
17 LOCATED AT 9414 PLAZA POINT DRIVE,)
18 MISSOURI CITY, TEXAS, 77459,)
19 Defendant,)
20 ROWLAND MARCUS ANDRADE,)
21 Claimant,)
22 SOLMAZ ANDRADE,)
23 Claimant, and)
24 WILMINGTON SAVINGS FUND SOCIETY,)
25 FSB as trustee for IRP FUND II TRUST 2A,)
26 Claimant.)
27 _____)
28

CIVIL CASE NO. 20-02013 VC

PUBLIC DECLARATION OF
CHRIS KALTSAS IN SUPPORT OF
ADMINISTRATIVE MOTION OF THE
UNITED STATES TO FILE UNDER
SEAL *EX PARTE* EVIDENCE IN
SUPPORT OF MOTION TO EXTEND STAY

1 I, Chris Kaltsas, Assistant United States Attorney for the Northern District of California, state as
2 follows:

3 1. I am the AUSA assigned to the above entitled civil forfeiture action. I make this
4 declaration in support of the United States Administrative Motion to File Under Seal *Ex Parte* Evidence
5 in the above-entitled action.

6 2. The *ex parte* evidence which the United States seeks to submit under seal contains
7 information, which if disclosed, could adversely affect ongoing criminal investigations and/or pending
8 criminal trials.

9 3. This motion is based upon 18 U.S.C. § 981(g)(5) which provides that in requesting a stay
10 the united States may “submit evidence ex parte in order to avoid disclosing any matter that may
11 adversely affect an ongoing criminal investigation or pending criminal trial.”

12 4. The purpose of the *in camera, ex parte* evidence is to explain to the Court why the instant
13 civil forfeiture action should be stayed under 18 U.S.C. § 981(g).

14 I declare under penalty of perjury that the foregoing is true and correct.

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16 Date:

17 /s/ Chris Kaltsas
18 CHRIS KALTSAS
19 Assistant United States Attorney
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